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December 20, 2013

The Honorable Roanne L. Mann
United States District Court Magistrate
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: U.S.A. v. Andrew Romagnoli, 13-MJ-976 (RLM)

Your Honor:

This is to request a permanent modification of Mr. Romagnoli's bond conditions to permit his travel to Florida for business purposes only. Mr. Romagnoli was released on a bond limiting his travel to New York City and Pennsylvania to visit family.

Prior to his arrest, Mr. Romagnoli was working with others on the development of a performing arts center outside of Miami. Mr. Romagnoli's role in the project is that of events director, he will book artists for performances or exhibits and then makes sure the venue has the appropriate city, police, and fire permits for the specific performance or exhibit. The project has reached the point where the developers are ready to sign employment contracts with Mr. Romagnoli and have him meet with the engineers to make final decisions about how to develop the performing arts space. These meetings will take place on January 3, 2014.

Mr. Romagnoli is requesting a permanent modification to the bond since it is likely he will have to travel to Miami one to two times per month as the project progresses. We therefore respectfully request a modification of his bond to permit Mr. Romagnoli to travel to Florida for business purposes only, on notice to Pretrial, with provision of the itinerary to pretrial before he travels. This itinerary will include where Mr. Romagnoli will be staying while in Florida, and how he can be reached while there. If there are any changes to his itinerary once in Florida, Mr. Romagnoli will immediately notify Pretrial Services. I have confirmed that neither the Government nor Pretrial Services has an objection to this modification of the bond.

Respectfully submitted,



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cc: Assistant U.S. Attorney David Pitluck, Esq.
U.S. Pretrial Services Officer Melony Bedford
ECF